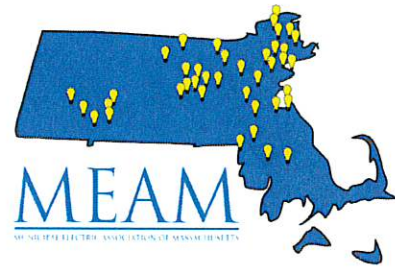


Municipal Electric Association of Massachusetts
Peter Dion, President
200 New Estate Road
Littleton, MA 01460



November 14, 2022

Ms. Tori Kim, Director
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Comments on Proposed MEPA Amendments 310 CMR 11.02

Dear Director Kim:

The Municipal Electric Association of Massachusetts, Inc. ("MEAM") represents the 41 Municipal Light Plants (MLPs) in Massachusetts and submits these comments regarding proposed amendments to regulations that may change where and how electrical infrastructure is repaired or replaced. MEAM's members are concerned the proposed changes may interfere with the MLPs' ability to provide effective and reliable electric service in conflict with their obligation to serve.

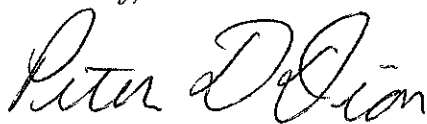
Accordingly, MEAM adopts the arguments and reasoning contained in the Eversource's comments dated November 14, 2022, with the following notations due to the unique statutes governing MLP operations:

MLPs agree that the "previously authorized" language is not something MLPs can adopt and recommends its elimination due to the fact that many MLPs do not petition for locations under c. 166.

Regarding the definition of "Routine Maintenance," MLPs may not subject to the same "performance standards" as Eversource and believes that language should be added to section (b) of Eversource's proposed definition that acknowledges utilities are subject to national safety codes regarding the placement and clearances of infrastructure such as poles.

In closing, we appreciate your consideration of our comments on these proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Dion". The signature is fluid and cursive, with the first name "Peter" and last name "Dion" clearly distinguishable.

Peter Dion
President, MEAM